

Gold Fields American Corporation

A Consolidated Gold Fields Group Company

230 Park Avenue / New York, N.Y. 10169
Telephone (212) 880-5100

Telex 23-8490 / Telecopier (212) 880-5191

June 12, 1989

RECEIVED

JUN 14 1989

REMD SECTION

Mr. Mark Logsdon
Adrian Brown Consultants, Inc.
155 South Madison Street, Suite 302
Denver, CO 80209-3014

Dear Mark:

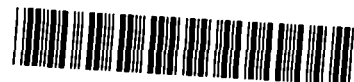
In respect of the leach tests that you are performing for EPA, and which Gold Fields and other PRP's are funding, a consulting geologist who has extensive knowledge of the field has pointed out to me that, whatever we may think we are measuring, it is not particularly meaningful, for the following reason:

The zone of known mineralization in Galena is approximately 2,500 acres. One can think of it as a huge, irregularly shaped bowl filled with poorly consolidated material called breccia. The bowl itself is surrounded and underlain by limestone. Although zinc and lead mineralization is everywhere, it occurred in sufficient concentrations to be mined in only about 10% of the mineralized zone. Those occurrences outcropped at surface and some went to depths in excess of 150 feet.

Because of the broken rock, or breccia, the whole of the subsurface is saturated, and subsurface water necessarily comes into contact with oxidizing mineralization. The same is true of surface water courses, such as Short Creek. Another prominent and well respected geologist, whose report is in the record, pointed out that this is so of every outcropping or near surface sulphide orebody irrespective of mining, although Galena may be an extreme example because of the brecciation; it is like a huge sponge.

Now, if you have surface, or near surface, material that leaches, because of rain water or whatever, mineralization at a level of X into ground water that for purely geological reasons is already 5X, testing that surface material will give you numbers, but not ones that have significance. As your tests progress, please keep that geological reality in mind.

If naturally occurring commercial minerals are characterized as toxic wastes, and thought of in the same way as spills of chemicals that are foreign to the environment, the results tend to be silly. No one, neither you, nor EPA, nor anyone at CH2M Hill,



S00081962
SUPERFUND RECORDS

Mr. Mark Logsdon

-2-

June 12, 1989

would consciously waste other people's money. Yet that is what is happening. And it is precisely because of this inverted, I-am-a-dentist: Therefore-you-have-a-toothache reasoning.

Very truly yours,

A handwritten signature in black ink, appearing to read "Arnold E. Godduhn", with a long horizontal flourish extending to the right.

Arnold E. Godduhn
Special Counsel

AEG/mdr

c.c.: Messrs.: Glen Curtis, EPA
Neil Geitner, CH2M Hill
William Bluck, CH2M Hill
Richard Glanznan, CH2M Hill

